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TO: ~~ATORBY~~
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GM Assembly Division

General Motors Corporation

Leeds Plant
6817 Stadium Drive
Kansas City, Missouri 64129

EPA-ARWM/WMBR

July 19, 1984

JUL 23 1984

Region VII K.C., MO

RECEIVED

JUL 20 1984

Mr. David A. Wagoner
Director, Air and Waste Management Division
U.S. Environmental Protection Agency, Region VII
324 East 11th Street
Kansas City, Missouri 64106

AIR AND HAZARDOUS MATERIALS
DIVISION

Dear Mr. Wagoner:

In response to your letter of July 10, 1984, we are providing the following information:

- o We are including a formal written request for withdrawal of the Leeds Plant Part "A" and Part "B" permit applications.
- o We are including a revised Notification of Hazardous Waste Activity form.
- o We will be submitting for your review the elements of a revised Closure Plan. We will submit this plan by October 1, 1984. The Closure Plan will address the cleaning of the storage pad and the internal inspection and cleaning of the waste solvent storage tank.

The underground waste solvent storage tank will be emptied, cleaned, and inspected. The waste removed will be handled as a hazardous waste and will be recycled through a permitted resource recovery facility. The cleaning/inspection procedure will be provided by a qualified contractor. The cleaning and inspection will be accomplished while the Leeds Plant production is halted between July 30 and August 6, 1984. When production is resumed the week of August 6, the tank will be placed back in service for solvent storage. The tank will be managed in compliance with the 90-day generator storage rule. This action is intended to satisfy the tank closure requirement and will be repeated on an annual basis.

The GM Leeds Plant will comply with the requirements of 262.34. The Leeds Plant presently has in place written procedures describing the requirements for labeling and dating wastes at the time of storage. This procedure is described in the Leeds Part "B" application and has been implemented through internal communication in the form of a "Bulletin" to those involved in the hazardous waste activity at the Leeds Plant. A copy of this document is included for your review. As previously discussed, the underground storage tank will be emptied and inspected annually.



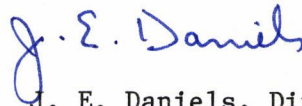
R00161428
RCRA RECORDS CENTER

We believe this satisfies all of the areas of concern as expressed in your letter of July 10, 1984.

If you have questions or comments, please contact L. Pemberton at the Leeds Plant, (913) 281-7388.

We would appreciate the opportunity to meet with you to discuss the elements of the change in status (Closure Plan).

Sincerely,



J. E. Daniels, Director
Plant Engineering

JED/ef